

STATE OF CALIFORNIA
ENVIRONMENTAL PROTECTION AGENCY
DEPARTMENT OF TOXIC SUBSTANCES CONTROL

In the Matter of:

Don T. Hartshorn

and
Oil Conservation Service, Inc.
3256 North Marks Avenue
Fresno, CA 93722

EPA ID NUMBER: CAD 980 673 842

Respondents.

Docket HWCA 2007 1371

STIPULATION AND ORDER

Health and Safety Code
Section 25187

1. INTRODUCTION

1.1. Parties. The California Department of Toxic Substances Control (Department) and Don T. Hartshorn and Oil Conservation Service, Inc., (Respondents) enter into this Stipulation and Order (Order) and agree as follows:

1.2. Site. Respondent, Oil Conservation Service, Inc., was, at the time of the inspection, a permitted storage and transfer facility. Respondent, Oil Conservation Service, Inc. was, at the time of the inspection, and remains a registered hazardous waste hauler operating at the following site: 3256 North Marks Avenue, Fresno, CA 93722 (Site). Respondent Hartshorn is the principal of Oil Conservation Service, Inc.

1.3. Inspection. The Department inspected the Site on September 25 and October 6, 2006.

///

///

1.4. Jurisdiction. Health and Safety Code, section 25187, authorizes the

Department to order action necessary to correct violations and assess a penalty when the Department determines that any person has violated specified provisions of the Health and Safety Code or any permit, rule, regulation, standard, or requirement issued or adopted pursuant thereto.

1.5. Hearing. Respondents waive any right to a hearing in this matter.

1.6. Full Settlement. By their respective signatures below, the Parties, and each of them, agree that this Order, and all of the terms contained herein, are fair, reasonable, and in the public interest. This Order shall constitute full settlement of the violations alleged below. By agreeing to this Order, the Department does not waive any right to take further enforcement actions within its jurisdiction and involving either the Respondent(s) or the Site, except to the extent provided in this Order.

2. VIOLATIONS

2.1. Enforcement Order. On January 25, 2007, the Department issued an Enforcement Order to Respondents, a true and correct copy of said Enforcement Order is attached hereto as Attachment A, and is incorporated herein by this reference.

2.2. Admissions. Respondents admit the violations set forth in the Enforcement Order.

3. SCHEDULE FOR COMPLIANCE

3.1. Respondents shall comply with the following:

3.1.1. Respondents shall make all payments at the time(s) and in accord with any other conditions set forth in Section 5 (Penalty) below.

3.1.2. Within 45 days of the effective date of this Order, Respondents shall submit for the Department's review and approval a closure plan as required by

California Code of Regulations, title 22, section 66264.112.

3.1.3. Within 180 days of the effective date of this Order, Respondents shall complete closure of Permitted Transfer Facility, EPA ID 980673842.

3.1.4. (a) Within 30 days of the effective date of this Order, Respondents shall establish a financial assurance mechanism authorized pursuant to California Code of Regulations, title 22, section 66264.143, subdivision (i)(1), and fund such mechanism in the total sum of \$25,000, which sum is not any part of a penalty assessed herein. Such mechanism shall provide financial assurance for closure.

(b) If such mechanism allows for withdrawals, Respondents shall be allowed reimbursements for sums expended in closure subject to the following:

After beginning final closure, Respondents may request reimbursements for closure expenditures by submitting itemized bills to the Department. Respondents may request reimbursements only if sufficient funds are remaining to cover the maximum remaining costs of closure. If the Department has reason to believe that the maximum cost of closure will be greater than the value of the mechanism, reimbursements of such amounts shall be withheld until the Department determines, until completion of closure of the facility.

3.1.5. Restriction. (a) During the period of time beginning on the effective date of this Order and continuing uninterrupted thereafter for five years, Respondent Hartshorn shall hold no ownership interest (legal, equitable, debt or beneficial) in any corporation, partnership, proprietorship, limited liability company, trust, or other business organization of any kind or description, that owns, rents, leases, supplies, operates, controls, manages, advises, consults with, supervises, or has any other

business or legal relationship with any facility permitted by, or otherwise subject to regulation by, the California Department of Toxic Substances Control.

(b) Notwithstanding the foregoing, this Order shall not be interpreted to prohibit Respondent from being employed for wages by any such facility in any position subject to the following, such positions shall not be executive, managerial, or supervisory of any other employee and shall not include the authority to make or consult on any regulatory compliance or other policy matters.

(c) Further, this Order shall not be interpreted to prohibit Respondent Hartshorn from continuing to own and operate Respondent Oil Conservation Service, Inc. in the same capacities as he has prior to this Order for so long as said Respondent Oil Conservation Service, Inc. continues to be Registered Hazardous Waste Transporter.

3.2. Submittals. All submittals from Respondent pursuant to this Order shall be sent to:

Robert Kou, Unit Chief
Enforcement and Emergency Response Program
Department of Toxic Substances Control
9211 Oakdale Avenue
Chatsworth, California 91311

///

///

3.3. Communications. All approvals and decisions of the Department made regarding submittals and notifications will be communicated to Respondents in writing by the Branch Chief, Department of Toxic Substances Control, or his/her designee. No informal advice, guidance, suggestions, or comments by the Department regarding reports, plans, specifications, schedules, or any other writings by Respondents shall be construed to relieve Respondents of their obligation to obtain such formal approvals as may otherwise be required.

3.4. Department Review and Approval. If the Department determines that any report, plan, schedule, or other document submitted for approval pursuant to this Order fails to comply with this Order or fails to protect public health or safety or the environment, the Department may:

- a. Modify the document as deemed necessary and approve the document as modified, or
- b. Return the document to Respondents with recommended changes and a date by which Respondent must submit to the Department a revised document incorporating the recommended changes.

3.5. Compliance with Applicable Laws. Respondents shall carry out this Order in compliance with all local, State, and federal requirements, including but not limited to requirements to obtain permits and to assure worker safety.

3.6. Endangerment during Implementation. In the event that the Department determines that any circumstances or activity (whether or not pursued in compliance with this Order) creates an imminent or substantial endangerment to the health or welfare of people on the site or in the surrounding area or to the environment, the

Department may order Respondents to stop further implementation of this Order for such period of time as needed to abate the endangerment. Any deadline in this Order directly affected by a Stop Work Order under this paragraph shall be extended for the term of such Stop Work Order.

3.7. Liability. Nothing in this Order shall constitute or be construed as a satisfaction or release from liability for any conditions or claims arising as a result of past, current, or future operations of Respondents, except as provided in this Order. Notwithstanding compliance with the terms of this Order, Respondents may be required to take such further actions as are necessary to protect public health or welfare or the environment.

3.8. Site Access. Access to the Site shall be provided at all reasonable times to employees, contractors, and consultants of the Department, and any other agency having jurisdiction. The Department and its authorized representatives shall have the authority to enter and move freely about all property at the Site at all reasonable times for purposes including but not limited to: inspecting records, operating logs, and contracts relating to the Site; reviewing the progress of Respondents in carrying out the terms of this Order; and conducting such tests as the Department may deem necessary.

Nothing in this Enforcement Order is intended to limit in any way the right of entry or inspection that any agency may otherwise have by operation of any law.

///

///

3.9. Sampling, Data, and Document Availability.

3.9.1. Respondents shall permit the Department and its authorized representatives to inspect and copy all sampling, testing, monitoring, and other data generated by Respondents or on Respondents' behalf, in any way pertaining to work undertaken pursuant to this Order.

3.9.2. Respondents shall allow the Department and its authorized representatives to take duplicates of any samples collected by Respondents pursuant to this Order. Respondents shall maintain a central depository of the data, reports, and other documents prepared pursuant to this Order. All such data, reports, and other documents shall be preserved by Respondents for a minimum of six years after the conclusion of all activities under this Order.

3.9.3. If the Department requests that some or all of these documents be preserved for a longer period of time, Respondents shall either:

- (a) comply with that request,
- (b) deliver the documents to the Department, or
- (c) notify the Department in writing at least six months prior to destroying any documents prepared pursuant to this Order and permit the Department to copy the documents prior to destruction.

3.10. Government Liabilities. Neither the State of California nor the Department shall be liable for injuries or damages to persons or property resulting from acts or omissions by Respondents or related parties in carrying out activities pursuant to this Order, nor shall the State of California nor the Department be held as a party to any contract entered into by Respondents or its agents in carrying out activities pursuant to

this Order.

3.11. Incorporation of Plans and Reports. All plans, schedules, and reports that require Department approval and are submitted by Respondents pursuant to this Order are incorporated in this Order upon approval by the Department.

3.12. Extension Requests. If Respondents are unable to perform any activity or submit any document within the time required under this Order, the Respondents may, prior to expiration of the time, request an extension of time in writing. The extension request shall include a justification for the delay.

3.13. Extension Approvals. If the Department determines that good cause exists for an extension, it will grant the request and specify in writing a new compliance schedule.

4. OTHER PROVISIONS

4.1. Penalties for Noncompliance. Failure to comply with the terms of this Order may subject Respondents to costs, penalties and/or damages, as provided by Health and Safety Code, section 25188, and other applicable provisions of law.

4.2. Parties Bound. This Order shall apply to and be binding upon Respondents and their officers, directors, agents, employees, contractors, consultants, receivers, trustees, successors, and assignees, including but not limited to individuals, partners, and subsidiary and parent corporations, and upon the Department and any successor agency that may have responsibility for and jurisdiction over the subject matter of this Order.

4.3. Privileges. Nothing in this Agreement shall be construed to require any party to waive any privilege. However, the assertion of any privilege shall not relieve

any party of its obligations under this Order.

4.4. Time Periods. “Days” for the purpose of this Order means calendar days.

4.5. Captions and Headings. Captions and headings used herein are for convenience only and shall not be used in construing this Consent Order.

4.6. Severability. If any provision of this Consent Order is found by a court of competent jurisdiction to be illegal, invalid, unlawful, void or unenforceable, then such provision shall be enforced to the extent that it is not illegal, invalid, unlawful, void, or unenforceable, and the remainder of this Consent Order shall continue in full force and effect.

4.7. Entire Agreement. This Consent Order contains the entire and only understanding between the Parties regarding the subject matter contained herein and shall supersede any and all prior and/or contemporaneous oral or written negotiations, agreements, representations and understandings and may not be amended, supplemented, or modified, except as provided in this Order. The Parties understand and agree that in entering into this Consent Order, the Parties are not relying on any representations not expressly contained in this Consent Order.

4.8. Counterparts. This Consent Order may be executed and delivered in any number of counterparts, each of which when executed and delivered shall be deemed to be an original, but such counterparts shall together constitute one and the same document.

4.9. Non-Waiver. The failure by one party to require performance of any provision shall not affect that party's right to require performance at any time thereafter, nor shall a waiver of any breach or default of this Contract constitute a waiver of any

subsequent breach or default or a waiver of the provision itself.

5. PENALTY

5.1. Respondents shall pay the Department a total penalty of \$ 266,700.00 as set forth below.

5.2. Respondents shall pay the total sum of \$76,000, of which \$10,000 is a penalty and \$66,000 is recovery of economic benefit as follows:

(a) Respondents shall make payments quarterly or more often, with the first payment due thirty days after the effective date of this order, according to one of the plans set forth below, election must be made at the time of the first payment, in the event that no election is stated, plan ii shall be deemed to have been elected.

(i) all payments to be made as set forth above within twenty-four months of the effective date of this order, without interest; or,

(ii) all payments to be made as set forth above within forty-eight months of the effective date of this order, with interest at the legal rate; or,

(b) Respondents may pay in full at any time without penalty and thereby terminate further interest, if applicable.

5.3. (a) In the event that Respondents do not comply with the provisions of paragraph 3.1.1 above, payment of the penalty set forth at paragraph 5.1 above is due, without further notice, in full within 60 days of the effective date of this Order.

(b) Notwithstanding paragraph (a) above, Respondents shall not be in violation of paragraph 5.2 until, and unless, they have missed two consecutive payments or a total of three payments during the course of the payment plan.

5.4. If, on the date which shall be five years after the effective date of this Order,

Respondents, and each of them, shall have strictly complied with all of the requirements of this Order and shall have paid all sums required to have been paid by that date pursuant to the terms and conditions of this Order, all unpaid sums then due shall be forgiven.

5.5. If Respondents fail to have strictly complied with all of the requirements of this Order and/or shall not have paid all sums required to have been paid by that date pursuant to the terms and conditions of this Order, the total sum set forth at paragraph 5.1 above, with due credit for all sums paid, shall then be immediately due and owing. Respondents further agree to pay interest at the rate established pursuant to Health and Safety Code section 25360.1 and to pay all costs incurred by the Department in pursuing collection including attorney's fees.

5.6. Respondents' checks shall be made payable to Department of Toxic Substances Control, shall identify the Respondent and Docket Number, as shown in the caption of this case, and shall be delivered together with the attached Payment Voucher to:

Department of Toxic Substances Control
Accounting Office
1001 I Street, 21st floor
P. O. Box 806
Sacramento, California 95812-0806

A photocopy of the checks shall be sent simultaneously to:

Roberto Kou, Unit Chief
Enforcement and Emergency Response Program
9211 Oakdale Avenue
Chatsworth, California 91311
and

James J. Grace
Senior Staff Counsel
Office of Legal Counsel
Department of Toxic Substances Control
8800 Cal Center Drive
Sacramento, California 95826-3200

5.4. If Respondent fails to make payment as provided above, Respondent agrees to pay interest at the rate established pursuant to Health and Safety Code, section 25360.1, and to pay all costs incurred by the Department in pursuing collection including attorney's fees.

6. EFFECTIVE DATE

6.1. The effective date of this Order is the date it is signed by the Department.

Dated: October 10, 2008

Original signed by Don T. Hartshorn
Don T. Hartshorn, individually and as President
of Oil Conservation Service, Inc.

Dated: November 10, 2008

Original signed by Florence Gharibian
Florence Gharibian
Department of Toxic Substances Control

///

///

ATTACHMENT A

STATE OF CALIFORNIA
ENVIRONMENTAL PROTECTION AGENCY
DEPARTMENT OF TOXIC SUBSTANCES CONTROL

In the Matter of:

Oil Conservation Service, Inc.
3256 North Marks Avenue
Fresno, CA 93722

EPA ID NUMBER: CAD 980 673 842

Respondent.

Docket HWCA 2007 1371

ENFORCEMENT ORDER

Health and Safety Code
Section 25187

INTRODUCTION

1.1. Parties. The State Department of Toxic Substances Control (Department) issues this Enforcement Order (Order) to Oil Conservation Service, Inc. (Respondent).

1.2. Site. Respondent is a permitted storage and transfer facility, and a registered hazardous waste hauler operating at the following site: 3256 North Marks Avenue, Fresno, CA 93722 (Site).

1.3. Permit/Interim Status. The Department authorized Respondent to manage hazardous waste by Standardized Hazardous Waste Facility Permit (Permit), issued on December 23, 1997, and by Hazardous Waste Transporter Registration # 1943 issued on June 12, 2007.

1.4. Jurisdiction. Section 25187 of the Health and Safety Code authorizes the Department to order action necessary to correct violations and assess a penalty when the Department determines that any person has violated specified provisions of the Health and Safety Code or any permit, rule, regulation,

standard, or requirement issued or adopted pursuant thereto.

DETERMINATION OF VIOLATIONS

2. The Department has determined that:

2.1. Respondent violated California Code of Regulation, title 22, section 66264.113, in that at an unknown date in 2004, Respondent failed to implement a closure plan within 90 days after receiving the final volume of hazardous waste at its facility.

2.2. Respondent (as a transporter) violated Health and Safety Code, section 25201, subdivision (a), in that at times between on or about January 26, 2005, and September 12, 2006, Respondent handled hazardous waste without a Hazardous Waste Facilities Permit or other grant of authorization from the Department. To wit: On at least 43 separate instances Respondent transferred used oil, a hazardous waste, from 55-gallon drums into a tanker truck.

2.3. Respondent violated Health and Safety Code, section 25250.9, subdivision (a), in that between on or about January 20, 2005, and September 12, 2006, Respondent failed to provide a written notification to each generator from whom it received used oil regarding the disposition of their used oil.

2.4. Respondent violated Health and Safety Code, section 25201, subdivision (a), in that on or about September 25, 2006, Respondent stored used oil filters at its facility without a permit or other grant of authorization from the Department.

2.5. Respondent violated Health and Safety Code, section 25189.2, in that between on or about December 1, 2005 and September 12, 2006, Respondent made false representations on manifests used for transporting used

oil. To wit: Respondent identified drummed waste received from generator(s) as waste transported in tanker truck(s).

2.6. Respondent (as a transporter) violated Health and Safety Code section 25201, subdivision (a), in that on 34 separate instances between on or about January 26, 2005 and September 12, 2006, Respondent stored hazardous waste in excess of the 10 days allowed under the transfer facility exemption without a permit or other grant of authorization from the Department.

2.7. Respondent violated California Code of Regulations, title 22, section 66264.143 and section 67800.5 in that since October 22, 2003, Respondent failed to demonstrate to the Department financial assurance for closure of the facility.

2.8. Respondent violated California Code of Regulations, title 22, section 66264.147 and section 67800.5 in that since October 22, 2003, Respondent failed to demonstrate to the Department financial responsibility for bodily injury and property damage to third parties caused by sudden accidental occurrences arising from operations of the facility in the amount \$300,000 per occurrence with an aggregate of at least \$600,000, exclusive of legal defense costs.

SCHEDULE FOR COMPLIANCE

3. Based on the foregoing Determination of Violations, IT IS HEREBY ORDERED THAT:

3.1.1. Within 30 days of the effective date of this Order, Respondent shall submit for the Department's review and approval a closure plan as required by California Code of Regulations, title 22, section 66264.112.

3.1.2. Effective immediately, Respondent (as a transporter) shall cease handling hazardous waste, including transferring used oil from 55-gallon drums into tanker trucks, without a Hazardous Waste Facilities Permit or other grant of authorization issued by the Department.

3.1.3. Effective immediately, Respondent shall provide a written notification to each generator from whom it receives used oil regarding the disposition of their used oil.

3.1.4. Effective immediately, Respondent shall cease storing used oil filters in excess of the time allowed under California Code of Regulations, title 22, section 66266.130, without a permit or other grant of authorization issued by the Department.

3.1.5. Effective immediately, Respondent shall cease making false representations on manifests used for transporting used oil.

3.1.6. Effective immediately, Respondent (as a transporter) shall cease storing hazardous waste in excess of the 10 days allowed under the transfer facility exemption without a permit or other grant of authorization from the Department that permits Respondent to store hazardous waste.

3.1.7. Effective immediately, Respondent shall cease operating its permitted storage and transfer facility until it demonstrates to the Department financial responsibility for bodily injury and property damage to third parties caused by sudden accidental occurrences arising from operations of the facility in the amount \$300,000 per occurrence with an aggregate of at least \$600,000, exclusive of legal defense costs, and financial assurance for closure of the facility.

3.2. Submittals. All submittals from a Respondent pursuant to this Order shall be sent to:

Robert Kou, Unit Chief
Enforcement and Emergency Response Program
Department of Toxic Substances Control
1011 North Grandview Avenue
Glendale, California 91201

3.3. Communications. All approvals and decisions of the Department made regarding submittals and notifications will be communicated to Respondent in writing by the Branch Chief, Department of Toxic Substances Control, or his/her designee. No informal advice, guidance, suggestions, or comments by the Department regarding reports, plans, specifications, schedules, or any other writings by Respondent shall be construed to relieve Respondent of the obligation to obtain such formal approvals as may be required.

3.4. Department Review and Approval. If the Department determines that any report, plan, schedule, or other document submitted for approval pursuant to this Order fails to comply with the Order or fails to protect public health or safety or the environment, the Department may:

- a. Modify the document as deemed necessary and approve the document as modified, or
- b. Return the document to Respondent with recommended changes and a date by which Respondent must submit to the Department a revised document incorporating the recommended changes.

3.5. Compliance with Applicable Laws: Respondent shall carry out this Order in compliance with all local, State, and federal requirements, including but not limited to requirements to obtain permits and to assure worker safety.

3.6. Endangerment during Implementation: In the event that the Department determines that any circumstances or activity (whether or not pursued in compliance with this Order) are creating an imminent or substantial endangerment to the health or welfare of people on the site or in the surrounding area or to the environment, the Department may order Respondent to stop further implementation of this Order for such period of time as needed to abate the endangerment. Any deadline in this Order directly affected by a Stop Work Order under this section shall be extended for the term of the Stop Work Order.

3.7. Liability: Nothing in this Order shall constitute or be construed as a satisfaction or release from liability for any conditions or claims arising as a result of past, current, or future operations of Respondent. Notwithstanding compliance with the terms of this Order, Respondent may be required to take further actions as are necessary to protect public health or welfare or the environment.

3.8. Site Access: Access to the site shall be provided at all reasonable times to employees, contractors, and consultants of the Department, and any agency having jurisdiction. Nothing in this Order is intended to limit in any way the right of entry or inspection that any agency may otherwise have by operation of any law. The Department and its authorized representatives shall have the authority to enter and move freely about all property at the Site at all reasonable times for purposes including but not limited to: inspecting records, operating logs, and contracts relating to the Site; reviewing the progress of Respondent in carrying out the terms of this Order; and conducting such tests as the Department may deem necessary. Respondent shall permit such persons to inspect and copy all records, documents, and other writings, including all

sampling and monitoring data, in any way pertaining to work undertaken pursuant to this Order.

3.9. Data and Document Availability. Respondent shall permit the Department and its authorized representatives to inspect and copy all sampling, testing, monitoring, and other data generated by Respondent or on Respondent's behalf in any way pertaining to work undertaken pursuant to this Order.

Respondent shall allow the Department and its authorized representatives to take duplicates of any samples collected by Respondent pursuant to this Order.

Respondent shall maintain a central depository of the data, reports, and other documents prepared pursuant to this Order. All such data, reports, and other documents shall be preserved by Respondent for a minimum of six years after the conclusion of all activities under this Order. If the Department requests that some or all of these documents be preserved for a longer period of time, Respondent shall either comply with that request, deliver the documents to the Department, or permit the Department to copy the documents prior to destruction. Respondent shall notify the Department in writing at least six months prior to destroying any documents prepared pursuant to this Order.

3.10. Government Liabilities: The State of California shall not be liable for injuries or damages to persons or property resulting from acts or omissions by Respondent or related parties in carrying out activities pursuant to this Order, nor shall the State of California be held as a party to any contract entered into by Respondent or its agents in carrying out activities pursuant to the Order.

3.11. Incorporation of Plans and Reports. All plans, schedules, and reports that require Department approval and are submitted by Respondent

pursuant to this Order are incorporated in this Order upon approval by the Department.

3.12. Extension Request: If Respondent is unable to perform any activity or submit any document within the time required under this Order, the Respondent may, prior to expiration of the time, request an extension of time in writing. The extension request shall include a justification for the delay.

3.13. Extension Approvals: If the Department determines that good cause exists for an extension, it will grant the request and specify in writing a new compliance schedule.

OTHER PROVISIONS

4.1. Additional Enforcement Actions: By issuance of this Order, the Department does not waive the right to take further enforcement actions.

4.2. Penalties for Noncompliance: Failure to comply with the terms of this Order may also subject Respondent to costs, penalties, and/or punitive damages for any costs incurred by the Department or other government agencies as a result of such failure, as provided by Health and Safety Code section 25188 and other applicable provisions of law.

4.3. Parties Bound: This Order shall apply to and be binding upon Respondent, and its officers, directors, agents, employees, contractors, consultants, receivers, trustees, successors, and assignees, including but not limited to individuals, partners, and subsidiary and parent corporations.

4.4. Time Periods. "Days" for purposes of this Order means calendar days.

PENALTY

5. Based on the foregoing DETERMINATION OF VIOLATIONS, the Department sets the amount of Respondent's penalty at \$266,700. Payment is due within 30 days from the effective date of the Order. Respondent's check shall be made payable to the Department of Toxic Substances Control, and shall identify the Respondent and Docket Number, as shown in the heading of this case. Respondent shall deliver the penalty payment to:

Department of Toxic Substances Control
Accounting Office
1001 I Street, 21st floor
P. O. Box 806
Sacramento, California 95812-0806

A photocopy of the check shall be sent to:

Roberto Kou, Unit Chief
Enforcement and Emergency Response Program
1011 N. Grandview Avenue
Glendale, CA 91201

and

James Grace, Esq.,
Office of Legal Counsel
Department of Toxic Substances Control
8000 Cal Center Dr.
Sacramento, California 95826

RIGHT TO A HEARING

6. Respondent may request a hearing to challenge the Order. Appeal procedures are described in the attached Statement to Respondent.

EFFECTIVE DATE

7. This Order is final and effective twenty days from the date of mailing, which is the date of the cover letter transmitting the Order to Respondent, unless Respondent requests a hearing within the twenty-day period.

Date of Issuance: February 15, 2008

Original Signed by Florence Gharibian

Florence Gharibian, Branch Chief
Department of Toxic Substances Control